

STEPHEN J. NUTTING, ESQ.
Law Office of Stephen J. Nutting
Post Office Box 5093
Saipan, MP 96950
Telephone: (670) 234-6891
Facsimile: (670) 234-6893

Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

GUIHUA BAI,

Plaintiff,

-vs-

GINTIAN CORPORATION, dba "LIGHT
MASSAGE, ZHONG LI and "Mr. ZHU":

Defendants

CIVIL ACTION NO. 07-0016

PLAINTIFF'S PRE-DISCOVERY
DISCLOSURE STATEMENT

COMES NOW, GUIHUA BAI, plaintiff in the above entitled action, pursuant to the Civil
Justice Reform Act to make the following pre-discovery disclosure:

1. Name of individuals likely to have discoverable information:

- a. Name: Guihua Bai
Address: c/o Law Office of Stephen J. Nutting
P.O. Box 5093
Saipan, MP 96950
Telephone No.: (670) 234-6891
- b. Name: Li Zhong
Address: c/o Gintian Corporation

1 PMB 90 P.O. Box 1003
2 Saipan, MP 96950
3 Telephone No.: Unknown

4 c. Name: Mr. Zhu
5 Address: c/o Gintian Corporation
6 PMB 90 P.O. Box 1003
7 Saipan, MP 96950
8 Telephone No.: Unknown

9 d. Name: Employees of "Light Massage"
10 Address: c/o Gintian Corporation
11 PMB 90 P.O. Box 1003
12 Saipan, MP 96950
13 Telephone No.: Unknown

14 The above-listed persons should have information regarding the defendants' failure to keep
15 and maintain adequate time and wage records and failure to pay overtime wages under the FLSA;
16 and the compensation scheme to pay employees by commission.

17
18 2. Description of documents in the possession of Plaintiff:

- 19 a. Massage Payment Schedule (In Chinese and English translation)
20 b. Passport of Guihua Bai
21 c. Personal records of cash salary received
22 d. Copy of Guihua Bai's CNMI Entry Permit
23 d. Annual Corporation Report of Gintian Corporation for 2006

24 Plaintiff hopes to receive additional documents from the defendants or from the
25 Department of Labor which are presently not in her possession, and will provide additional notice
26 of the existence of such documents to defendants upon receipt.

27 3. Disclosure of expert testimony: At this time, Plaintiff does not anticipate the need for any
28

